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6 Attorneys for Defendant  
JASON EDWARD THOMAS CARDIFF

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10 UNITED STATES DISTRICT COURT  
11 CENTRAL DISTRICT OF CALIFORNIA

12 UNITED STATES OF AMERICA,

13 Plaintiff,

14 vs.

15 JASON EDWARD THOMAS  
16 CARDIFF,

17 Defendant.

Case No. 5:23-cr-00021-JGB

**DECLARATION OF STEPHEN G.  
LARSON IN SUPPORT OF JASON  
CARDIFF'S *EX PARTE*  
APPLICATION FOR PERMISSION  
TO TRAVEL TO KANSAS CITY**

*[Filed concurrently with Ex Parte  
Application and [Proposed] Order]*

**DECLARATION OF STEPHEN G. LARSON**

I, Stephen G. Larson, declare as follows:

1. I am a partner with Larson LLP, and I represent Jason Cardiff in this matter. I make this declaration in support of Jason Cardiff's *Ex Parte* Application for Permission to Travel to Kansas City.

2. Mr. Cardiff has been released on a \$530,000 appearance bond, justified in the amount of \$500,000 with full deeding of real property. His release conditions include, among other conditions: a travel restriction to the Central District of California and the Southern District of Texas; a curfew between the hours of 8:00 p.m. and 8:00 a.m.; participation in the Location Monitoring Program with location monitoring technology at the discretion of the Supervising Agency; and placement in the custody of third-party custodian, Attorney Stephen Cochell. Lilia Murphy and Brian Kennedy executed affidavits of sureties in support of the bond. Ms. Murphy also deeded her home as collateral. The December 6, 2023 Release Order and Bond Form is attached as **Exhibit A**.

3. Mr. Cardiff is currently living with Attorney Cochell in Kingwood, Texas, and he is being supervised by United States Probation Officer Jack Sherrod of the Southern District of Texas.

4. Jason Cardiff serves as the CEO and President of Redwood Scientific Technologies, Inc. ("Redwood"). He is seeking permission to travel to Kansas City without his third-party custodian, Attorney Cochell, on December 30, 2023 with a return to Texas on January 1, 2024. The purpose of this requested travel is to engage in two days of meetings and engagements with Redwood shareholders and directors. Surety Brian Kennedy will be in attendance at these meetings and engagements as well.

5. On December 19, 2023 and December 20, 2023, my law partner, Hilary Potashner, spoke with United States Probation Officer Jack Sherrod, the federal officer supervising Mr. Cardiff. With the understanding that Attorney Cochell

1 would not be traveling with Mr. Cardiff, Officer Sherrod advised that United States  
2 Probation does not oppose this request. Officer Sherrod did, however, request that  
3 the curfew be lifted for the nights that Mr. Cardiff would be at a hotel in Kansas  
4 City, explaining that it is logistically difficult to enforce a curfew in a hotel.

5 6. Should Mr. Cardiff be permitted to travel to Kansas City, he will  
6 nonetheless remain subject to the bond condition that he participate in the Location  
7 Monitoring Program.

8 7. Hilary Potashner also personally spoke by telephone on December 20  
9 with Sureties Lilia Murphy and Brian Kennedy. Both Ms. Murphy and Mr.  
10 Kennedy indicated that they do not oppose Mr. Cardiff's request.

11 8. On December 20, 2023, AUSA Valerie Makarewicz advised that the  
12 government opposes Mr. Cardiff's request to travel to Kansas City.

13 I declare under penalty of perjury under the laws of the United States of  
14 America that the foregoing is true and correct to the best of my knowledge.

15 Executed on this 20th day of December, 2023, at Los Angeles, California.

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17 /s/ Stephen G. Larson  
18 Stephen G. Larson  
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